

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

SNMP RESEARCH, INC. and SNMP
RESEARCH INTERNATIONAL, INC.,

Plaintiffs,
v.

BROADCOM INC.; BROCADE
COMMUNICATIONS SYSTEMS LLC; and
EXTREME NETWORKS, INC.

Defendants.

Case No. 3:20-cv-00451

**SPECIALLY APPEARING DEFENDANTS' JOINT MOTION TO STAY DISCOVERY
AND FOR A PROTECTIVE ORDER**

Come now the Defendants Broadcom Inc. ("Broadcom"), Brocade Communications Systems LLC, ("Brocade"), and Extreme Networks, Inc. ("Extreme") (collectively, "Defendants") specially appearing, and respectfully move to stay discovery and for a protective order under Federal Rule of Civil Procedure 26(c) until resolution of the pending motions to dismiss. By filing this motion, Defendants do not submit to the jurisdiction of this Court or waive any defenses, including for lack of personal jurisdiction and improper venue.

In support of their Motion, Defendants submit the accompanying Memorandum of Facts and Law, the Declaration of Alison Plessman, and the Declaration of Jordan Feirman. The parties have met and conferred, as detailed in the accompanying Memorandum, and have been unable to reach resolution on this matter. Defendants request oral argument on this motion at the

Court's earliest convenience. Defendants request this motion be treated on an expedited basis and heard prior to January 25, 2021, if possible, as the response date for the voluminous discovery served by Plaintiffs is January 25, 2021 and they have refused to grant an extension.

Dated: January 15, 2021

HUESTON HENNIGAN LLP

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